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**From:** Keenan, Dru [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=9525DC06E2E74BB89DA45F7E19B2E0CA-KEENAN, DRU]  
**Sent:** 1/14/2016 4:01:24 PM  
**To:** Nickel, Brian [Nickel.Brian@epa.gov]  
**CC:** Abbotts, John [Abbotts.John@epa.gov]  
**Subject:** RE: Completed Form 2A Applications and Variance Applications

Hi Brian, I'll look into what I can come up with. I can definitely go further back, but screening for majors might take additional checking. I'll get back to you a little later today

*Dru*

Druscilla Keenan  
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**From:** Nickel, Brian  
**Sent:** Wednesday, January 13, 2016 5:38 PM  
**To:** Keenan, Dru <keenan.dru@epa.gov>  
**Cc:** Abbotts, John <Abbotts.John@epa.gov>  
**Subject:** RE: Completed Form 2A Applications and Variance Applications

Dru:

Is there a way you can narrow your search to major POTWs (or at least majors in general)?

Only major POTWs would be required to report toxicity data on Form 2A. I don't see any major POTWs on this list, which means we'd have to look back further in time.

Thanks,

Brian Nickel, E.I.T.

Environmental Engineer  
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<http://epa.gov/r10earth/waterpermits.htm>  
[https://usepa-my.sharepoint.com/personal/nickel\\_brian\\_epa\\_gov/Blog](https://usepa-my.sharepoint.com/personal/nickel_brian_epa_gov/Blog)  
*Please conserve natural resources by not printing this message.*

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**From:** Keenan, Dru  
**Sent:** Wednesday, January 13, 2016 2:24 PM  
**To:** Nickel, Brian <[Nickel.Brian@epa.gov](mailto:Nickel.Brian@epa.gov)>  
**Cc:** Abbotts, John <[Abbotts.John@epa.gov](mailto:Abbotts.John@epa.gov)>  
**Subject:** RE: Completed Form 2A Applications and Variance Applications

Sorry Brian, I can't add anything more to what John said. Determining an application complete includes some discretion and we often overlook 'form' as long as the requisite data is provided.

Below is a list of applications we received over the last year. If you see any that you'd like to look at, they can be pulled from the permit file.

Permit No.	Facility Name	Post Mark Date on Application
ID0020176	ABERDEEN OF CITY OF WWTP	1/23/2015
WA0025577	NAVAL BASE KITSAP BANGOR	2/27/2015
WA0026760	SEAPLANE BASE LAGOON WWTP/U.S. NAVY	4/8/2015
WA0026786	LITTLE GOOSE LOCK AND DAM, USCE	4/17/2015
WA0026794	LOWER GRANITE LOCK AND DAM	4/17/2015
WA0026808	LOWER MONUMENTAL LOCK AND DAM	4/17/2015
WA0026816	ICE HARBOR LOCK AND DAM, USACE	4/17/2015
WA0026778	US ARMY OF ENGINEERS BONNEVILLE PROJECT	5/4/2015
WA0003468	NAVAL AIR STATION WHIDBEY ISLAND	5/14/2015
ID002119	FRUITLAND, CITY OF	5/22/2015
WA0026701	THE DALLES LOCK AND DAM	6/25/2015
WA0026824	McNARY LOCK AND DAM, USACE	8/5/2015

WA0026832	US ARMY OF ENGINEERS/ JOHN DAY PROJECT	8/12/2015
ID0020141	DRIGGS, CITY OF	8/28/2015
ID0020150	OROFINO, CITY OF WWTP	11/13/2015
ID0028005	KAMIAH, CITY OF WWTP	11/30/2015

*Dru*

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**From:** Nickel, Brian  
**Sent:** Wednesday, January 13, 2016 1:25 PM  
**To:** Abbotts, John <[Abbotts.John@epa.gov](mailto:Abbotts.John@epa.gov)>; Keenan, Dru <[keenan.dru@epa.gov](mailto:keenan.dru@epa.gov)>  
**Subject:** FW: Completed Form 2A Applications and Variance Applications

John, Dru:

See Troy's first request in his e-mail below. I could certainly send DEQ some 2A permit applications, but the concern that I have is that all but the most recent applications likely wouldn't comply with the sufficiently sensitive methods rule (and I'm not sure we're sticklers about ensuring compliance with that rule even now).

Can you think of any recent permit applications for POTWs that have come in, which are particularly good examples, and which used sufficiently sensitive methods for their effluent testing?

Thanks,

Brian Nickel, E.I.T.

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**From:** [Troy.Smith@deq.idaho.gov](mailto:Troy.Smith@deq.idaho.gov) [<mailto:Troy.Smith@deq.idaho.gov>]

**Sent:** Wednesday, January 13, 2016 1:09 PM

**To:** Nickel, Brian <[Nickel.Brian@epa.gov](mailto:Nickel.Brian@epa.gov)>

**Cc:** [Ester.Ceja@deq.idaho.gov](mailto:Ester.Ceja@deq.idaho.gov)

**Subject:** Completed Form 2A Applications and Variance Applications

Hi Brian,

As you know, we are in the process of developing an IPDES web-based application process and the associated database. As such, we have a couple of questions/favors to ask (I have cc'd Ester Ceja, our IPDES Data Management Coordinator):

1. Could you please provide us with one or more completed Form 2A applications, which include the toxicity testing data? We have many questions about how the applicants typically present data in several of the sections of these forms. Having completed examples will help us correctly develop the online application and database storage.
2. Does EPA have specific variance application forms (for water quality or effluent guideline variances)? If so, could you please point me in the direction? If not, what is the process for an applicant to apply for these variances?

Thank you for any assistance you can provide.

-Troy

*Troy G. Smith*

*IPDES Rules and Guidance Coordinator*

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